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August 27, 1999

Mr. Scott A. Francis
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: Texas Freedom Fund, 30-Day Post-General Report (10/15/98-11/23/98)
Identification Number: C00340661

Dear Mr. Francis:

I am writing on behalf of the Texas Freedom Fund (the "Committee") in response to questions raised by the Federal Election Commission (the "FEC") concerning information contained in the Committee's 30-Day Post-General Report for the period October 15, 1998 through November 23, 1998 (the "Report"). An itemization of the Committee's response to the FEC's question follows:

1. The Committee's Report discloses no payments for administrative expenses during the five-week Report period because there were none. The Committee did not incur any expenses for the purpose of operating the Committee such as rent, utilities, salaries, telephone service, office equipment and supplies during the Report period.

As you are aware, the Committee is a new political committee (the Committee's Statement of Organization was filed with the FEC on October 6, 1998). In the first few weeks of its existence, services provided to the Committee were in the form of individual volunteer activity. Pursuant to 11 C.F.R. §100.7(b)(3), the value of services provided without compensation by any individual who volunteers on behalf of a political committee is not a contribution and, therefore, is not subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 C.F.R. §104.13. Other than the cost of a meeting held on October 6, 1998, that was properly reported as an in-kind contribution received from an individual on the Committee's 1998 12-Day Pre-General Report, there were no other administrative expenses to report.

In subsequent reporting periods, the newly formed Committee began to incur administrative expenses that were properly reported on its 1998 Year-End and 1999 Mid-Year reports.